



Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of )  
)  
Implementation of Section 621(a)(1) of the Cable ) MB Docket No. 05-311  
Communications Policy Act of 1984 as Amended )  
by the Cable Television Consumer Protection and )  
Competition Act of 1992 )

**COMMENTS OF North Suburban Access Corporation (dba CTV North Suburbs)**

North Suburban Access Corporation (NSAC), appreciates the opportunity to file comments on the Second Further Notice of Proposed Rulemaking ("FNPRM") in the above-referenced docket. NSAC is a nonprofit 501c3 representing each of nine member cities, including Arden Hills, Falcon Heights, Lauderdale, Little Canada, Mounds View, New Brighton, North Oaks, Roseville, and St. Anthony in Minnesota, which serves approximately 106,000 citizens. The organization produces community focused digital media for the purpose of educating and engaging our citizens, and manages eight cable channels, including one high definition channel, and facilitates an additional nine municipal channels for the cities.

We strongly oppose the tentative conclusion in the FNPRM that the value of cable franchise obligations, such as those that allow our programming to be viewed on the cable system, can be deducted from franchise fees.

The NSAC is a nonprofit organization that has recently had a massive funding reduction. Already experiencing a drastic reduction in funding, this ruling will cripple the organization



financially, which provides platforms for community-centric shows such as multi-award winning Disability Viewpoints. This program focuses in on issues impacting individuals with disabilities. Programming of this hyper-focused nature provides valuable content for our community.

NSAC also provides a platform to educate and inform our citizens about valuable nonprofits in the area that are bolstering their community. We provide a forum to host approximately twenty nonprofit organizations to inform the community of the positive impact they are providing. This communication avenue is vital for informing community members about the nonprofits' mission, but also acts as a way for nonprofits to rally support around their cause. The content creation is echoed throughout the year via cable replays, social media distribution, and webcast.

NSAC also provides an educational platform to teach recent immigrants how to produce their own studio show via our television production equipment. This learning process helps build language and job skills, strengthens sense of community, and provides unique programming with insights of recent immigrants. With provisions from the FNPRM, this type of programming would not be possible.

We reject the implication in the FNPRM that PEG programming is for the benefit of the local franchising authority (LFA) or the PEG provider, rather than the public. As demonstrated above, NSAC provides valuable services and programming to the community that would not be available. Valuable programming of hyper-local content is overlooked by networks. With the





continual McDonaldization of news and video content, it is more vital than ever to bolster community media. The FNPRM cuts down all of these initiatives, dismantling strong, community-focused organizations.

In conclusion, we strongly oppose the proposed rules in the FNPRM.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Dana Healy".

Dana Healy  
Executive Director  
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11/13/18